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Counsel for Defendant HCRE Partners, LLC (n/k/a NexPoint Real Estate Partners, LLC)

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re:	§	Case No. 19-34054-SGJ-11
HIGHLAND CAPITAL MANAGEMENT, L.P	\$ -, \$	Chapter 11
Debtor.	§ §	
HIGHLAND CAPITAL MANAGEMENT, L.P	§ ., §	
Plaintiff.	<b>§</b>	
v.	§ §	
HCRE PARTNERS, LLC (n/k/a NEXPOINT	§ §	Adversary No.: 21-03007-sgj
REAL ESTATE PARTNERS, LLC),	§ 8	
Defendant.	\$ \$	

## ENTRY OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that, pursuant to Rule 9010(b), Fed. R. Bankr. P., Deborah Deitsch-Perez and Michael P. Aigen of Stinson LLP hereby enter this Notice of Appearance in the above-styled case on behalf of Defendant HCRE Partners, LLC (n/k/a NexPoint Real Estate Partners, LLC), and, pursuant to Rules 2002 and 9007, Fed. R. Bankr. P., request that all notices and pleadings given or required to be served in these proceedings be served upon the undersigned at the postal and email addresses, telephone, and telecopy numbers listed below.

PLEASE TAKE FURTHER NOTICE that the foregoing request includes notices and pleadings referred to in the Federal Rules of Bankruptcy Procedure and any applicable local rules, and additionally includes, without limitation and where applicable, any application, complaint, demand, notice of hearing, motion, objection, plan, disclosure statement, pleading, or request, formal or informal, whether transmitted or conveyed by mail, email, telecopy or otherwise.

This notice and any subsequent appearance, pleading, claim, or suit shall not operate to waive any right of HCRE Partners, LLC (n/k/a NexPoint Real Estate Partners, LLC), to withhold consent to entry of final judgments by the Bankruptcy Court in particular proceedings in the captioned cases, have final orders in non-core matters entered only after de novo review by a District Court judge, withdraw the reference of any such proceedings to the District Court, seek trial by jury in any such proceedings, or assert other rights, claims, actions, defenses, setoffs, or recoupments to which HCRE Partners, LLC (n/k/a NexPoint Real Estate Partners, LLC) is or may be entitled under agreements, in law, or in equity, including any defenses as to jurisdiction, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Respectfully submitted,

## STINSON LLP

By: /s/ Deborah Deitsch-Perez

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ATTORNEYS FOR DEFENDANT HCRE PARTNERS, LLC (n/k/a NEXPOINT REAL ESTATE PARTNERS, LLC)

## **CERTIFICATE OF SERVICE**

I certify that on June 3, 2021, a true and correct copy of the foregoing document was served on all counsel of record via the Court's electronic filing system.

/s/ Deborah Deitsch-Perez

Deborah Deitsch-Perez